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OFFICE OF
DEFECTS INVESTIGATION

PACCAR Inc
Law Department

February 24, 2004

SENT VIA FACSIMILE (202) 366-7882 & MAIL
Attn: Mr. George Person

NHTSA-04-17437-1

Recall Management Division
Office of Defects Investigation (NEF-111)
Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street SW
Washington, D.C. 20590

DEPT. OF TRANSPORTATION
DOCKETS
2004 MAR 29 A 9:51

**Re: Inconsequential Defect Exemption Petition
Trailer ABS warning light (PLC) Noncompliance
Peterbilt Recall No.: 104-A**

Dear Mr. Person:

PACCAR Inc hereby submits a petition for inconsequential defect exemption regarding trailer ABS warning light (Power Line Carrier) noncompliance on certain Peterbilt Motors Company vehicles.

Two types of fluorescent lights installed in the sleeper of Peterbilt models 387, 379, 378, and 385 are creating an electromagnetic interference (EMI), which interferes with the Power Line Carrier (PLC) trailer ABS malfunction signal. The fluorescent light, when on, can interfere with proper operation of the PLC signal, preventing the telltale from functioning. FMVSS 121 §5.1.6.2(b) requires that a dash light (telltale) "...shall remain activated..." in the event of a trailer ABS malfunction. Therefore, the affected vehicles are non-compliant with FMVSS 121 because the telltale may be precluded from being activated when the sleeper fluorescent light is in use. PLC and the telltale operate correctly when the fluorescent light in the sleeper is off. There are an estimated 4009 vehicles manufactured between April 3, 2003 and November 28, 2003 with the affected fluorescent lights.

PACCAR Inc is issuing this petition for exemption for the following reasons:

1. The in-cab trailer ABS malfunction warning lamp is redundant to the existing trailer ABS malfunction indicator lamp located on the exterior of the trailer and visible from the driver side mirror. Prior to the in-cab warning lamp, the trailer mounted indicator was the only warning available to drivers. The indicator on the exterior of the trailer is not

affected by this defect and would continue to warn the driver in the event of a trailer ABS malfunction. All trailers are required to be equipped with an external antilock malfunction indicator lamp through March 1, 2009 (FMVSS 49 CFR Part 571.121, S5.2.3.3(a) Antilock malfunction indicator).

2. Additionally, the in-cab warning lamp will not function only if the fluorescent light in the sleeper is on. This is not likely to occur while the vehicle is being driven and if so it would be a small percentage of the time.
3. Not all suspect vehicles will exhibit the issue. Due to manufacturing variances, some fluorescent lights emit more EMI than others. The PLC signal strength from the trailer is also a factor. The telltale will operate normally in most cases with a strong trailer PLC signal and only marginal EMI. However the telltale will not operate with a normal to marginal trailer PLC signal and high EMI.
4. The foundation brakes on the trailer are not impacted.

If you have any questions please feel free to contact Paul Giampapa (425) 468-7387.

Very truly yours,



Kenneth R. Brownstein
Senior Counsel

KRB:ptg

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